



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

SEP 27 2016

Mr. Gary Kippur
President
Tucson Iron and Metal
P.O. Box 28898
Tucson, Arizona 85726

RE: Petition for Approval for Operating Parameter Limits (OPLs) in Lieu of a Wet Scrubber and Related Plan - Other Solid Waste Incinerators (OSWI), New Source Performance Standards (NSPS) Subpart EEEE – Tucson Iron and Metal (TIM), Tucson, Arizona Contraband Incinerator

TIM constructed a dual chamber, commercial incinerator which thermally destroys contraband for U.S. Department of Homeland Security Customs and Border Protection (CBP) and other law enforcement agencies at the TIM facility located in Tucson, Arizona. The incinerator is subject to the requirements of NSPS EEEE of C.F.R. Part 60 – Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006. TIM submitted a petition pursuant to 60.291, which states "If you use an air pollution control device other than a wet scrubber... you must petition EPA for specific operating limits, the values of which are to be established during the initial performance test and then continuously monitored thereafter." Given the information submitted, the US Environmental Protection Agency (EPA) conditionally approves your request, as delineated in this letter, to use a dry sorbent (Trona) scrubber in place of the Wet Gas Scrubber (WGS) required by NSPS EEEE.

The September 10, 2015 correspondence include a petition for TIM to implement OPLs in lieu of installing a wet scrubber. In the petition, TIM outlined the following specific proposed OPLs to be monitored in accordance with the information required by 40 C.F.R. § 60.2917 (a)-(e):

- Monitoring feed rate into the incinerator, up to a maximum load of 2030 pounds per hour (lb/hr) of contraband, including the associated packaging;
- Maintaining a minimum temperature of 1400 degrees Fahrenheit (°F) in the incinerator secondary combustion chamber;
- Monitoring and recording the sorbent feed in 15 to 20 minute increments to provide the hourly sorbent feed rate for abatement, as well as maintaining a minimum sorbent injection rate of 30 lb/hour.
- Continuously measuring and recording the CO and O₂ concentrations in the incinerator stack with a commissioned CEMS.

In your petition, the following information was presented: the relationship between the proposed OPLs and applicable emission rates and limits; how the upper and lower OPL range limits will be established; the methods that will be used to monitor and measure the OPLs; and, the frequency and methods for instrument

Printed on Recycled Paper

ED_005878_00000174-00001

recalibration. The proposed OPLs are consistent with the special conditions of Air Permit Number 127, issued by PDEQ on April 22nd, the equipment configuration of the incinerator, and the operation of the associated alternate pollution control device (i.e. fabric filter baghouse).

Based on the information submitted, EPA conditionally approves TIM's petition for the proposed OPLs, contingent on the successful completion of the initial performance testing. This conditional approval is site-specific to the OSWI unit at the TIM facility in Tucson, Arizona. If you have any questions or concerns about this conditional approval, please contact Nathan Dancher or my staff, at 415-972-3482, or at dancher.nathan@epa.gov.

Sincerely,



Joel Jones, Assistant Director
Enforcement Division

cc: Irvin Bilsky, Bilsky Environmental
Rupesh Patel, Air Permit Manager, Pima County Department of Environmental Quality
James M. Jones, Senior Air Permit Engineer, Pima County Department of Environmental Quality